

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

FEB 12 2021

United States of America

v.

Misty Dawn NICOL;  
Franklin Herbert ODELL;  
Suzanne Renee HINCKLEY

Case No.

C-21-203M

Nathan Ochsner, Clerk of Court

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 11, 2021 in the county of Nueces in the  
Southern District of Texas, the defendant(s) violated:

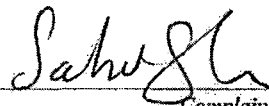
## Code Section

## Offense Description

Title 21, USC Secs. 841 (a) (1) (a)  
& 846Knowingly, intentionally, and unlawfully conspire to possess and possess  
with the intent to distribute a controlled substance in Schedule II of the  
Controlled Substance Act of 1970, to wit approximately 605.02 grams (AGW)  
of methamphetamine.

This criminal complaint is based on these facts:

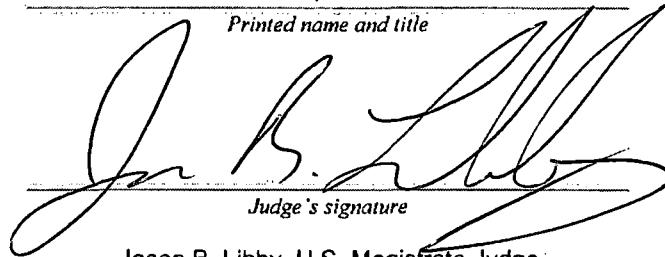
See Attachment "A"

☒ Continued on the attached sheet.

Complainant's signature

Sarah N. Salinas, Task Force Officer

Printed name and title

Submitted by reliable electronic means, sworn to, signature  
attested telephonically per Fed.R.Crim.P.4.1, and probable  
cause found onDate: February 12, 2021City and state: Corpus Christi, Texas

Judge's signature

Jason B. Libby, U.S. Magistrate Judge

Printed name and title

## **Attachment A**

The information contained in this report/affidavit is based upon my personal participation in the investigation, which included, but is not limited to, information relayed to me by other agents and officers participating in the investigation.

### **FACTS/DETAILS:**

Misty Dawn NICOL, Franklin Herbert ODELL, and Suzanne Renee HINCKLEY,

On February 11, 2021, the Drug Enforcement Administration (DEA) Corpus Christi Resident Office (CCRO) HIDTA Group 2 executed a search warrant at 1146 Winnipeg Drive, Corpus Christi, Texas 78418. The search warrant was signed on February 9, 2021 by Jason B. Libby, US Magistrate Judge. At approximately 08:30 am, a 2013 silver Nissan Sentra approached the target location. A white male, later identified as Franklin Herbert ODELL, exited the driver side of vehicle and entered the target location through the garage door. ODELL opened the garage door via garage door opener fob located in his vehicle. Agents approached the location and entered through the open garage door to serve the search warrant.

Agents located and secured Misty Dawn NICOL in the master bedroom and ODELL in the master bathroom attempting to destroy a bag of methamphetamine by flushing the evidence down the toilet. A search of the target location was conducted and Agents recovered methamphetamine, marijuana and assorted pills. A search of ODELL was conducted and agents located a hotel room key in his pants pocket. During the interview, NICOL advised Suzanne Rene HINCKLEY stays in a hotel with ODELL. Agents arrived at the Residency Executive Hotel Room 224 and located co-conspirator HINCKLEY.

NICOL and ODELL were placed under arrest.

HINCKLEY was cooperative with Agents and was transported back to the DEA office for questioning.

After the target location was secured, Task Force Officer Bob LaRock and Task Force Officer Sarah Salinas interviewed all parties involved.

NICOL, in an interview, was read her Advice of Rights in English by TFO LaRock. NICOL acknowledged she understood her rights and agreed to provide a statement at that time. During the interview, NICOL advised ODELL used her residence as a stash house for illegal narcotics. NICOL stated ODELL stored the narcotics in the safe in the master bathroom.

ODELL, in an interview, was read his Advice of Rights in English by TFO LaRock. ODELL advised he took acceptance and responsibility of all the narcotics located in the residence.

HINCKLEY, in an interview, was read her Advice of Rights in English by TFO LaRock. NICOL acknowledged she understood her rights and agreed to provide a statement at that time. HINCKLEY advised she assisted ODELL in the distribution of methamphetamine.

Special Agent Antonio De La Cruz and Task Force Officer Allen Colston processed the suspected methamphetamine which field tested positive for methamphetamine.

TFO LaRock spoke with AUSA Neel Kapur who accepted prosecution of NICOL, ODELL, and HINCKLEY for knowingly, intentionally, and unlawfully conspire to possess and possess with Intent to Distribute 605.22 grams of methamphetamine (AGW). The amount of methamphetamine infers the intent to distribute.

Respectfully submitted,



Sarah N. Salinas

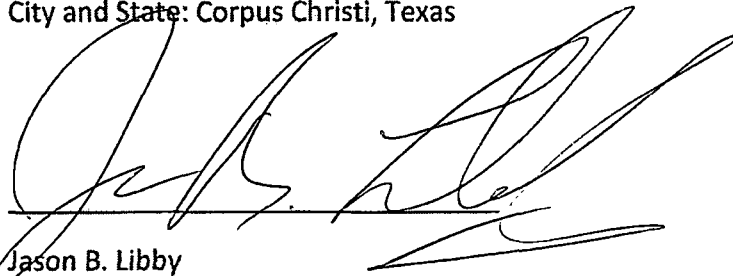
Task Force Officer

Drug Enforcement Administration

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P. 4.1., and probable cause found on:

Date: February 12, 2021

City and State: Corpus Christi, Texas



Jason B. Libby

United States Magistrate Judge